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NAS SAUFLEY FIELD  
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
REVIEW AND COMMENTS ON DRAFT SITE ASSESSMENT REPORT FOR SITE 5 FORMER  
AVGAS SYSTEM NAS SAUFLEY FIELD FL

04/17/2015  
GRABKA,D

N63082.AR.000039  
CID CORRY STATION  
5090.3a

LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
REVIEW AND COMMENTS ON DRAFT SITE ASSESSMENT REPORT FOR SITE 5 FORMER  
AVGAS SYSTEM CID CORRY STATION FL  
04/17/2015  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



**FLORIDA DEPARTMENT OF  
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April 17, 2015

Mr. John Schoolfield  
Remedial Project Manager  
ITP Gulf Coast  
Naval Facilities Engineering Command Southeast  
Attn: AJAX Street, Building 135N  
P.O. Box 30A  
Jacksonville, FL 32212-0030

RE: Draft Site Assessment Report for Site 5 – Former AVGAS System, Saufley Field,  
Pensacola, Florida.

Dear John:

I have completed my review of Draft Site Assessment Report for Site 5 – Former AVGAS System, Saufley Field, dated November 2012 (received November 19, 2012), prepared and submitted by Tetra Tech, Inc. I have the following comments on the draft report:

- (1) On page 1-2, Section 1.3, first paragraph, last sentence, there is an extra comma that should be removed.
- (2) On page 1-3, in the fourth bulleted item, trichloroethene should replace trichloroethane.
- (3) In Section 3, in the discussion of site lithology and hydrology, many references are made to Site 4 and UST Site 2406. Please explain at the beginning of the section the relevance of both sites to Site 5.
- (4) On page 4-5, Section 4.3, it says that six DPT screening point groundwater samples were collected. The text should refer to Figure 4-5, which shows where the samples were collected.
- (5) On page 4-5, Section 4.3, first paragraph, second sentence, it says that groundwater laboratory analytical results are included in Appendix E. Appendix E contains 95% UCL calculations. Please correctly identify the appendix the groundwater analytical are located in.

- (6) In Section 4.3, please discuss the relationship of the groundwater sampling locations to the locations where contaminated soil was detected. Were groundwater samples collected from the locations where soil contaminant concentrations exceeded the Department's leachability to groundwater soil cleanup target levels?
- (7) In Section 5.1.1, on page 5-2, fourth sentence from top of page, please change the sentence to state that the TPH speciation surface soil sample 05-SS-132 contained C5-C7 aromatics at an estimated concentration equal to their leachability to groundwater SCTL.
- (8) On page 5-3, the term LOQ is used as a substitute for the Department's Practical Quantitation Limit (PQL). Please verify that the terms mean the same thing. The Department's site cleanup rule specifically mentions that PQLs can replace CTLs when the laboratory analytical method cannot attain the CTL and if the PQL is equal to or less than the chemical and media-specific concentrations contained in the Department's "Guidance for the Selection of Analytical Methods for the Evaluation of Practical Quantitation Limits".
- (9) In Table 4-2 and Figure 4-5, benzo(a)anthracene is identified as having been detected in groundwater screening samples at concentrations above its groundwater cleanup target level (GCTL) and slightly above its limit of quantitation. This is not mentioned in the text in Section 4. Please provide a discussion regarding these detections.
- (10) Lead was detected in all six groundwater screening samples collected at Site 5 at concentrations above its GCTL. It is suggested in the report that the elevated lead concentrations detected may be attributable to suspended particulates in turbid groundwater collected using screening point samplers. Please provide recommendations for either verifying or assessing the nature and extent of lead concentrations in groundwater.
- (11) In Section 5.4, page 5-8, in the discussion regarding benzo(a)anthracene detected in groundwater, the Department's rounding memo is used to round the benzo(a)anthracene concentrations down to 0.2 µg/L, which is specified as the surrogate groundwater cleanup target level. Please note that the Department's rounding memo states that "If the CTL has one significant figure, the analytical results for that contaminant may be rounded to one significant figure, except that if the PQL applies, the analytical results for that contaminant may be rounded to the number of significant figures in the PQL reported by the laboratory." The Empirical Laboratories, LLC, analysis data sheets report the Limit of Quantitation for benzo(a)anthracene to three significant digits. Because of the

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screening nature of the groundwater samples collected, the detection of various polynuclear aromatic hydrocarbons (PAHs) in more than one sample, and the benzo(a)anthracene concentrations detected slightly above its Limit of Quantitation in half the groundwater samples analyzed, PAHs should not be eliminated as chemicals of potential concern without further groundwater sampling and analysis.

If you have any concerns regarding this letter, please contact me at (850) 245-8997.

Sincerely,

A handwritten signature in blue ink that reads "David P. Grabka". The signature is fluid and cursive, with a long horizontal line extending to the right.

David P. Grabka, P.G.  
Remedial Project Manager  
DoD and Brownfields Partnerships  
Waste Cleanup Program

CC: Greg Campbell, NAS Pensacola  
Frank Lesesne, Tetra Tech, Tallahassee

KAW

Handwritten initials "KAW" in blue ink, written in a cursive style.